

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:  
*Eugene Pate v. Zhejiang Huahai  
Pharmaceutical Co., et, al*  
(Case No. 1:20-cv-01248-RBK-JS)

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

**FIRST AMENDED NOTICE OF DEPOSITION OF BHAVIN R. DAVE, M.D.**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Counsel for Plaintiff will take the oral deposition, stenographically of Dr. Bhavin R. Dave, on **October 29, 2021, at 4:00 p.m. E.S.T.** and continuing until completion. The deposition will take place at Wharton, Levin, Ehrmantraut & Klein, P.A., 300 Delaware Ave., Suite 1110, Wilmington, DE 19801, and via Zoom video conference. Additional counsel who wish to attend remotely will have the option to do so using audio visual conference technology and should contact Veritext at [valsartan@veritext.com](mailto:valsartan@veritext.com) to arrange for login credentials to be sent to them prior to the deposition. This deposition will be taken before a notary public or some other officer authorized to administer oaths. Additionally, in accordance with paragraph B(1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the deposition. The attorney contact for the deposition is:

Paige N. Boldt  
WATTS GUERRA LLC  
5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
(210) 448-0500  
[pboldt@wattsguerra.com](mailto:pboldt@wattsguerra.com)

Date: October 28, 2021

Respectfully submitted,

/s/ Paige N. Boldt  
Paige N. Boldt  
WATTS GUERRA LLC  
5726 West Hausman Rd. Ste. 119  
San Antonio, TX 78249  
Telephone: (210) 448-0500  
E-Mail: pboldt@wattsguerra.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of October 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Dr. Bhavin R. Dave to be served upon counsel of record. I further certify that a copy of the foregoing was served on Defendant's counsel by e-mail on October 28, 2021.

This 28th day of October 2021.

*/s/ Paige N. Boldt*  
*Attorney for Plaintiff*

**Exhibit A**

**Documents to be Produced**

You shall bring to the deposition the following documents that are in your possession, control or custody:

1. A current version of your CV/resume.
2. A list of all of your publications.
3. Any and all correspondence between you and any defendant in this MDL.